U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
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HELENA, MONTANA 59626

Ref: 8MO

September 12, 2011

Mr. Brian Hasselbach
Federal Highway Administration
585 Shepard Way
Helena, Montana 59601

and

Mr. Tom Martin
Environmental Services
Montana Department of Transportation
2701 Prospect Avenue
Helena, Montana 59620-1001

Re: Russell Street/South 3rd Street Reconstruction Final EIS; CEQ # 20110264

Dear Mr. Hasselbach and Mr. Martin:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) for the Russell Street/South 3rd Street Reconstruction Project in accordance with EPA's responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321 *et.seq.* and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

The Federal Highway Administration (FHWA), Montana Department of Transportation (MDT) and City of Missoula have identified Alternative 4 and Alternative E as the preferred alternatives for reconstruction of Russell Street and South 3rd Street, respectively. Alternative 4 involves construction of four lanes on Russell Street (two southbound and two northbound lanes), incorporating a raised median, center turn lane, and traffic signals at five select intersections; and including demolition of the existing two lane Russell Street bridge over the Clark Fork River, and replacing it with a new four lane bridge. Alternative E involves reconstructing the existing two lane road on South 3rd Street with raised landscaped medians, center turn lane, and traffic signals at five select intersections. Bicycle lanes and sidewalks would also be provided on both Russell Street and South 3rd Street to better accommodate bicycle and pedestrian travel.

The EPA supports the FHWA, MDT, and City of Missoula efforts to improve safety and mobility in the Russell Street and South 3rd Street corridors, particularly efforts to mitigate environmental impacts of roadway reconstruction and to increase opportunities for pedestrian and bicycle travel. We appreciate receipt of the responses to EPA comments on the draft EIS provided in Appendix H of the FEIS, particularly the additional information city and state officials have provided to EPA regarding the issue of PM-10 hot spot analysis. As noted in the FEIS, the EPA concurs that a PM-10 qualitative hot spot analysis is not required.

The FEIS states that to minimize dust from construction activities that would contribute to ambient concentrations of particulate matter, the construction contractor will only be required to comply with Montana DOT Best Management Practices (or BMPs) and the Montana Pollutant Discharge Elimination System Construction General Permit (page 4-56). EPA requests that appropriate mitigation measures for PM, diesel emissions, and other Mobile Source Air Toxics (MSATs) be included in the Record of Decision (ROD). As noted in our October 14, 2008 comments on the DEIS (see Appendix H of the FEIS, pages H-137 through H- 146), EPA stated in comment number 11 (the FEIS references this comment as "117-K"):

> "We believe the FEIS should identify the specific actions to be taken to minimize dust, and equipment emissions from construction vehicles and roadway vehicles and other activities that will disturb the soil. This will enable the public to better understand efforts to reduce dust emissions during construction. We also recommend that the FEIS describe methods that will be used to minimize tracking of soil and mud from unpaved areas during construction to avoid particulate matter pollution from the re-entrainment of dried mud and soil by vehicles passing through and near the project area."

The response to this comment in the FEIS (Appendix H, page H-145) states the following:

> "The EIS references Best Management Practices, which provides more flexibility at this stage of the project development process. This project will likely be constructed in phases over several years, and the construction techniques and abatement measures may change. Identifying specific measures in the EIS limits the ability of the contractor to provide competitive bids and limits the ability to employ new techniques developed after the EIS is completed."

EPA believes that exposure to particulate matter ($PM_{2.5}$ and PM_{10}), diesel emissions, and MSATs may occur for a period of years with this project and specific mitigation measures should be included in the ROD. These specific measures would be a starting point for mitigation of particulate matter and diesel engine/MSAT emissions and can always be augmented as new techniques are developed. Mitigation measures for air quality construction impacts should include, but are not limited to:

- Requiring heavy construction equipment to use the cleanest available engines or to be retrofitted with diesel particulate control.
- Requiring diesel retrofit of construction vehicle engines and equipment as appropriate.

- Using alternatives, as appropriate, for diesel engines and/or diesel fuels such as: biodiesel, LNG or CNG, fuel cells, and electric engines.
- For winter time construction, installing engine pre-heater devices to eliminate unnecessary idling.
- Prohibiting tampering with equipment to increase horsepower or to defeat emission control devices effectiveness.
- Requiring construction vehicle engines to properly tuned and maintained.
- Use of construction vehicles and equipment with the minimum practical engine size for the intended job.
- Using water or wetting agent to control dust.
- Using wind barriers and wind screens to prevent spreading of dust from the site.
- Having a wheel wash station and/or crushed stone apron at egress/ingress areas to prevent dirt being tracked onto public streets.
- Using vacuum-powered street sweepers to remove dirt tracked onto streets.
- Covering all dump trucks leaving sites.
- Covering or wetting temporary excavated materials.
- Using a binding agent for long-term excavated materials.
- Monitoring for PM_{10} to allow for the real-time modification or implementation of various dust control measures.
- Locating diesel engines as far away as possible from residential areas.
- Locating staging areas as far away as possible from residential uses.
- Scheduling work outside of normal hours for sensitive receptors; should be necessary only in extreme circumstances, such as construction immediately adjacent to a health care facility, church, outdoor playground, or school.
- Air quality monitoring during construction activities. Factors to be considered for monitoring would be the immediate proximity of the project to homes, schools, businesses, and other sensitive populations. Although best management practices will be utilized during construction, potential localized impacts from $PM_{2.5}$ and PM_{10} emissions could occur.

Finally, we want to indicate that we appreciate the commitment to implement water quality BMPs during road and bridge construction; capture and treat road and bridge runoff prior to discharge to the aquifer and/or the Clark Fork River; prepare an erosion control plan and obtain an MPDES Stormwater discharge permit from the Montana Dept. of Environmental Quality; and obtain 124 and 404 permits from the Montana Dept. of Fish, Wildlife & Parks and U.S. Army Corps of Engineers, respectively. It will be important that entry of concrete dust, construction debris, and lead based paint dust or flakes into the Clark Fork River be avoided during demolition of the old Russell Street bridge and reconstruction of the new bridge.

If you have questions regarding our input please feel free to call Mr. Stephen Potts of my staff in Missoula at 406-329-3313 or in Helena at 406-457-5022. Questions regarding our air quality comments should be directed to Mr. Tim Russ in Denver at 303-312-6479. Thank you for the opportunity to review and comment during the NEPA process.

Sincerely,

Julie A. DalSoglio

Julie A. DalSoglio
Director
Montana Office

cc: Suzanne Bohan/Judy Roos, EPA, 8EPR-N, Denver
Gregg Wood, City of Missoula Public Works, Missoula